10 Panoramic Way Berkeley, CA 94704 August 23, 1999

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Dr. Jane E. Henney: Commissioner Food and Drug Administration 5600 Fishers Lane, Room 14-71 Rockville, MD 20857

Unnecessary Use of Drugs at Factory Farms Threatens Public Health. I ask the FDA to Ban the Use of Antibiotics As Livestock Growth Promoters

The increased use of antibiotics to fatten hogs and poultry has gone hand-in-hand with the development of industrial-style livestock operations. Fifty million pounds of antibiotics are produced in the U.S. every year; 40% of that is given to animals, and 80% of what is given to animals is used to promote their growth. With thousands of animals crammed into the tight quarters of a typical factory operation, antibiotics are dispensed constantly through the animals' feed.

Using antibiotics as a feed additive to fatten livestock more quickly is making disease-causing bacteria more resistant to the drugs humans rely upon to treat tuberculosis, pneumonia, staph infections, and other life-threatening infectious diseases.

Antibiotics are critical in treating infectious diseases. But repeated exposure to the drugs enables resistant strains of bacteria to evolve. Initially, some bacteria may be naturally resistant, and they survive treatment and multiply. When antibiotics are given again, more of the bacterial population may become resistant, and as that proportion increases over time, the drugs become less effective. The more antibiotics we use, the more likely it is that bacteria will become

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resistant. People are exposed to these antibiotic-resistant bacteria through the food supply and drinking water.

Physicians are finding an increasing number of cases in which antibiotics are no longer curing diseases. For example, as many as 40% of strains of streptococcus pneumoniae, a bacterium that causes pneumonia and bloodstream and ear infections, are now resistant to penicillin and other commonly used antibiotics. Patients with antibiotic-resistant infections have died. The Institute of Medicine, part of the National Academy of Sciences, estimated that annual cost of treating antibiotic resistant infections in the U.S. is \$30 billion.

The World Health Organization called for a ban on using antibiotics to fatten livestock in 1997. Since then, the Centers for Disease Control and Prevention, the American Public Health Association and other public health organizations have taken similar positions. The European Union heeded these concerns last year when it banned adding human-use antibiotics to animal feed.

Previous efforts to ban antibiotics as feed additives to fatten livestock have failed because of the opposition of the livestock industry and drug manufacturers. Now the Food and Drug Administration is considering a new petition to ban the use of medically useful antibiotics as growth promoters.

This action would be an important step in protecting the effectiveness of drugs used to treat human diseases and in stopping industrial-style livestock production. I applaud you for proposing the banning of antibiotics as growth promotors.

Thank you for your attention to my point of view.

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